

**AFFIDAVIT IN SUPPORT OF AN  
APPLICATION FOR AN ARREST WARRANT**

I, Thomas G. Sample, do hereby depose and state as

1. I am a Special Agent of the Federal Bureau of Investigation ("FBI") and have been so employed since May 12, 2019. I am currently assigned to the Domestic Terrorism squad of the FBI's Boston Field Office ("JTTF"). As a member of the JTTF, I have participated in numerous investigations involving national security matters. I have participated in the execution of search warrants for documents, electronic media, and other evidence. Before being employed as an FBI Agent, I served as a police officer for the Greenville Police Department in Greenville, South Carolina for seven years.

2. As a Special Agent with the FBI, I have responded to numerous domestic threat investigations, domestic terrorism investigations and arson investigations. I have also received specialized training regarding investigative techniques, evidence collection, and evidence preservation.

3. Throughout my employment with the FBI, I have participated in investigations involving the execution of arrest warrants.

4. I am aware that Title 18 of the United States Code, Section 1361, makes it a crime for anyone to willfully injure or

commit any depredation against any property of the United States or any department of agency thereof.

4. Having so said, I make this affidavit in support of a criminal complaint charging Brian Ricardo Dennis ("Dennis"), DOB xx/xx/1968, with willfully injuring and committing depredation against property of the United States on July 31, 2020.

5. The facts stated herein are based on my own personal knowledge, as well as information provided to me by witnesses and other law enforcement involved in the investigation. In submitting this affidavit, however, I have not included each and every fact known to me about this investigation, but only the facts which I believe are sufficient to establish the requisite probable cause.

#### **INVESTIGATION**

6. On the morning of July 31, 2020, I became aware that an individual ("the Suspect"), at approximately 1:20 am in Chelsea, Massachusetts, had scaled the Boston FBI Headquarters' ("Headquarters") perimeter fence, and had used a large rock to cause damage to one of the Headquarters' building's exterior doors.

7. The FBI's video surveillance cameras were functioning and operating at this date and time. I have reviewed the video surveillance from this time period and observed the Suspect climbing over the Headquarters' perimeter fence, banging

on one of the Headquarters' exterior doors with his hands, retrieving a large rock, and throwing the large rock repeatedly against the exterior door. I observed the glass on this exterior door to be shattered and broken. I also observed the Suspect climbing back over the fence and exiting the area.

8. Based upon my review of the video surveillance, I observed the Suspect to be a black male with a bald head, gray facial hair, wearing a dark-colored t-shirt, dark-colored shorts with a white stripe, and dark shoes. I also observed that the large rock the Suspect used appeared to have a dark stain.

9. On July 31, 2020, at approximately 8:30 am, I went to the Headquarters and observed damage to an exterior door. I also noted what I believed to be a bloodstain on a large rock that appeared to be similar to or the same as the one that I had seen the Suspect using on the video surveillance as described above. Other FBI agents informed me that they had seen a stain of substance believed to be blood on the Headquarters' perimeter fence at the location where the Suspect is observed on video surveillance to be climbing.

10. I later learned from local law enforcement that an individual (later determined to be Dennis), had, at 1:45 am, been encountered by law enforcement at a local gas station. The gas station is less than .2 miles from Headquarters. During this encounter law enforcement noted that Dennis had significant

injuries to his right hand and transported him to the Emergency Room at the Whidden Memorial Hospital in Everett, Massachusetts. Due to the extent of his injuries, Dennis was transported to Beth Israel Hospital in Boston and was released later in the day.

11. I have spoken with a law enforcement officer who had observed video surveillance of Dennis as he arrived at the Whidden Memorial Hospital. The officer described Dennis as a black male with a bald head and gray facial hair, wearing a dark-colored t-shirt, dark shorts with a white stripe and dark-colored shoes.

#### **THE INTERVIEW OF BRIAN R. DENNIS**

12. On July 31, 2020 at approximately 11:15 am, FBI Special Agent Zachary Hogan ("Hogan"), FBI TFO John Coleman ("Coleman") and I went to Beth Israel Hospital to interview Dennis.

13. Upon arrival at the hospital we were directed to Dennis' room. I observed Dennis to be a black male with a bald head, gray facial hair, wearing a hospital gown, dark shorts with a white stripe down the side. I noted that there were a pair of dark-colored shoes on the floor of Dennis' room. I noted that the shorts Dennis was wearing appeared to be blood-stained. I also noted that Dennis's right hand was being attended to by medical professionals.

14. I advised Dennis who we were and asked him if he would be willing to talk with us and Dennis agreed to speak with us. Prior to questioning, Dennis was advised of his *Miranda* rights and signed a form indicating the same. The interview was audio recorded.

15. During the interview, Dennis stated that he had left his home in Everett earlier in the evening and was drinking following a fight with his wife. Dennis initially stated that he had been struck by an automobile on Revere Beach Parkway and only remembered being at a gas station before the police arrived. Dennis was then shown video still pictures taken from Headquarters' building earlier in the morning. Dennis admitted that the person in the video still pictures was him. Dennis then stated that he became paranoid and believed several cars were following him. Dennis then stated he remembered being at a glass door and banging on the door. Dennis stated that when no one answered he, Dennis, picked up a rock and threw it against the door. After striking and damaging the door, Dennis stated that he climbed back over the fence and left the area by the railroad tracks.

17. I have also learned that fingerprints taken from Headquarters have been processed by the FBI's Laboratory and were confirmed to match the prints on file for Dennis


**CONCLUSION**

19. Based on the foregoing, I believe there is probable cause to believe that Brian R. Dennis did, on July 31, 2020, willfully injure and commit depredation against any property of the United States, and any department and agency thereof, in violation of 18 U.S.C. § 1361.

/s/ Thomas G. Sample

FBI SA THOMAS G. SAMPLE  
Sworn telephonically pursuant  
To Fed.R.Crim.P.41 (d)(3)

Subscribed and sworn to telephonically in accordance with Federal Rule of Criminal Procedure 4.1 on August 1 2020.

  
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HONORABLE JUDITH G. DEIN  
US MAGISTRATE JUDGE